

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JAMES H. HUNTER,)	
)	
)	
Plaintiff,)	
)	
vs.)	
)	
DEUTSCHE LUFTHANSA AG,)	
GLOBAL DEFENSE TECHNOLOGY)	CIVIL ACTION NO. 09-3166(RJD)(JMA)
& SYSTEMS, INC.,)	
GLOBAL STRATEGIES GROUP)	
(UNITED KINGDOM) LIMITED,)	
GLOBAL STRATEGIES GROUP)	
HOLDING, S.A., and)	
ETIHAD AIRWAYS P.J.S.C.,)	
)	
Defendants.)	
_____)	

SECOND DECLARATION OF JOHN HILLEN

I, John Hillen, submit this Declaration pursuant to 28 U.S.C. § 1746.

1. My name is John Hillen. I am over the age of twenty-one, suffer no legal disability, and am competent to make this Declaration. The statements made herein are true and correct, and are based on my personal knowledge.

2. As noted in my previous Declaration, signed on February 4, 2010, I am the President and Chief Executive Officer of Global Defense Technology & Systems, Inc. (GTEC or “the Company”). In addition, I serve as a Member of the Company’s Board of Directors.

3. I have reviewed Plaintiff’s March 5, 2009 Memorandum of Law in Opposition to All of the Defendants’ Various Motions to Dismiss (“the Opposition”). Pages 30 and 31 of the Opposition note a GTEC press release dated February 8, 2010 indicating that I would attend an

industry conference of companies in the Aerospace and Defense fields scheduled to be held in New York on February 10, 2010.

4. The February 8, 2010 press release was drafted by GTEC's Investor Relations staff. Neither Defendant Global Strategies Group Holding, S.A. (GLUHOLD) nor Defendant Global Strategies Group (United Kingdom) Limited (GGB) participated in drafting the February 8 press release. The press release concerned only activities related to GTEC, and not those of GLUHOLD or GGB.

5. I was unable to attend this conference due to inclement weather in the Washington, DC region.

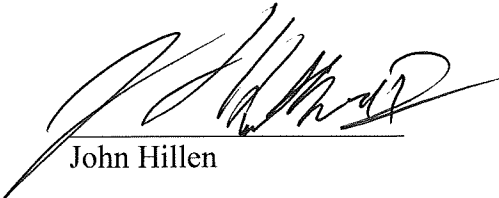
6. No representative from GTEC attended the conference.

7. Along with Jim Allen, GTEC's Chief Financial Officer, I made a brief presentation by phone to those attending the conference.

8. As I noted in my February 4, 2010 Declaration, GTEC has never maintained and does not maintain today any offices, representatives, agents, or phone numbers in New York. No director, employee, or other agent of the Company has ever been based or is based today in the New York.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of March 2010.



John Hillen